

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Civil Action No. 5:14-cv-00454-FL

LAURA LIEBERMAN,)
)
Plaintiff,)
)
v.)
)
ERIC GOINS, in his individual capacity,)
TYLER MCNEILL, in his individual)
capacity, ANITRA PEACOCK, in her)
individual capacity, DAPHNE SHEPARD,)
in her individual capacity, WAYNE)
COUNTY OFFICE OF EMERGENCY)
SERVICES, COUNTY OF WAYNE,)
NORTH CAROLINA, and CITY OF)
GOLDSBORO, NORTH CAROLINA,)
)
Defendants.)

JOINT MOTION FOR EXTENSION OF
TIME TO CONDUCT 26(f)
CONFERENCE

COME NOW all parties, and respectfully request that this Court allow an extension of time of up to 60 days for the parties to conduct an initial discovery conference pursuant to Rule 26(f) and submit a proposed discovery plan. In support of this motion, the parties show the following:

1. On October 23, 2014, the North Carolina State Bar announced that they would be suspending David Sutton's law license for a period of five years. An order to that effect was entered on November 13, 2014.

2. As a result of this suspension, Mr. Sutton will be unable to represent the Plaintiff in this matter for the duration of the proceedings. Plaintiff is currently in the process of retaining new counsel, at which point Mr. Sutton intends to withdraw from the case.

3. A discovery conference was scheduled to be conducted on November 14, 2014. Counsel for all parties, including Mr. Sutton, called in to participate in the conference.

4. At the start of the conference, Mr. Sutton indicated that he did not believe he could agree on a discovery schedule on behalf on his client, given that he would be withdrawing from the case in the near future.

5. Counsel for all parties agreed to make a joint motion to this Court seeking an extension of time to conduct the discovery conference.

6. As such, counsel for all parties request that an order be entered allowing a 60 day extension of time to conduct this conference, in order to give the Plaintiff time to retain a new attorney who can participate in a scheduling conference.

7. This Motion is filed in good faith for the reasons stated and not for purposes of delay.

WHEREFORE, counsel for all parties respectfully request that this Court allow an extension of time of up to 60 days for the parties to conduct an initial discovery conference pursuant to Rule 26(f) and submit a proposed discovery plan.

This the 21st day of November, 2014.

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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2014, I electronically filed the foregoing *Joint Motion for Extension of Time to Conduct 26(f) Conference* with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: David C. Sutton at lawyer1@davecsuttonlaw.com and Anakah Dawn Harrison at adharrison@nclawyers.com.

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